Please submit written comments on the draft Nitrogen Fertilizer Rule by August 11, 2017 through mail or email to:

**Mail**
Larry Gunderson
Pesticide and Fertilizer Management Division
Minnesota Department of Agriculture

625 Robert Street North
St. Paul, MN, 55155-2538

**Email**
Larry.Gunderson@state.mn.us

All comments should, but are not required to, include a contact name, phone number and/or email address to provide for follow-up discussion on specific comments.

**Questions**
For any questions regarding the content of the draft Nitrogen Fertilizer Rule, please contact Larry Gunderson, Fertilizer Technical Unit Supervisor
Larry.Gunderson@state.mn.us | 651-201-6168

**Comments**

I just spoke to you by phone. Because the wetter used in wheater production is pumped in March and April or pre

In accordance with the Americans with Disabilities Act, this information is available in alternative forms of communication upon request by calling 651-201-6000. TTY users can call the Minnesota Relay Service at 711. The MDA is an equal opportunity employer and provider.
We can't apply N/H4 in the fall. I don't believe that Minnesota can compete with California as our yields would be at least 25% less.

We apply N/H4, injecting it about 10" deep with shanks spaced 22" apart. The wider spacing is necessary as plant root being lower specific gravity will plug up under narrower spacings.

This wider spacing also thins the too-thick "wild rice into rows by the fertilized band every 22" to grow rapidly while the area away from the injection site sizzles out. After the initial seeding wild rice on subsequent years grows from seeds that fall of prior to harvest or from combine harvesting loss.

It's not possible to grow wild rice on land that allows water to sink down very deep; it needs an impermeable soil near the surface to allow flooding.

All the wells in the area are flowing wells. All new septic drainfields installed are mound systems, I don't believe it's possible for surface water to penetrate 100' or more of blue clay to get down to an aquifer that is pressurized by a pressure head waiting to be released by flowing wells.

Sincerely,

John Gunverston
218-487-5788 home
268-4415 Shop Farm
In the 1970s there were about 25 farms that grew wild rice on the glacial lake Agassiz former lake bed along the Red Lake, Clearwater, and Ojibwe rivers, as well as on ditch systems draining into these lakes. Unfortunately California obtained wild rice seed and with their favorable climate and deep, well-drained paddy areas for growing wild rice, the competition and resulting lower prices hurt all but the most productive farms. The wild rice business and business declined.

The Harrison Beach ridge at about m 2.44 m in front of the trail is about 100 yards from the eastern end of the area. The area is similar to that of the Minnesota wild rice area. The trail is 4.3 miles long and 4-1/2 miles wide. The trail begins at the north end of the area. The area is about 1,500 acres.

The Harrison Beach ridge is located on the south end of the Clearwater River. The southern end of the ridge is about 4 miles from the Clearwater River. The northern end of the ridge is about 4 miles from the Clearwater River. The northern end of the ridge is about 4 miles from the Clearwater River. The northern end of the ridge is about 4 miles from the Clearwater River. The northern end of the ridge is about 4 miles from the Clearwater River.

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